In some cases, longer due dates are specifically requested by the customer. For example, customers sometimes contact Ameritech service centers prior to changing their address, and they ask for service, including a PC change, several days in advance of the date they want it. Similarly, PC changes that are part of a larger order for multiple service changes can be delayed if some other part of the order is delayed. Also, PC changes on accounts with a large number of lines or certain complex accounts can take longer than three days to implement because of switch capacity limitations. Ameritech simply cannot commit to processing every PC change within 3 or 5 days. Thus, if the Commission believes that safeguards are necessary to protect against discrimination in the processing of PC changes, it should require nondiscrimination reports. Those reports would, in any event, be more effective in preventing and revealing discrimination than would a 3 or 5-day maximum period, particularly since the vast majority of PC changes are processed within 24 hours.

The Commission should also reject requests that it impose unique verification obligations on LECs, such as requirements that LECs (but not other carriers) verify all inbound sales and/or that they be limited to third party verification procedures. These proposals are based on the erroneous premise that a carrier that executes its own PC change is somehow more able to engage in slamming than a carrier that must submit its PC changes to another carrier for execution. This premise might have some merit if executing carriers performed some verification function and thereby could prevent a slam on an unauthorized PC change submitted by an unaffiliated carrier. In that event, one might reasonably question whether that "watchdog" function would be performed to the same degree if the executing carrier were processing its own PC change. However, carriers that execute PC changes do not verify changes submitted by their competitors; they simply process them. Thus, there is no greater or lesser risk of an unauthorized PC change when a carrier processes a change on its own behalf than when it processes a change on behalf of an unaffiliated carrier. If verification is unnecessary in one case, it is equally unnecessary in the other, and if verification options are appropriate in one case, those same options are appropriate in the other.

D. The Commission Should Not Establish a Third Party Administrator for PC Changes and Freezes

A few IXCs, including Sprint, TRA, and LCI, ask the Commission to transfer PC administration functions from LECs to a neutral third party.[32] According to Sprint, "[a]s long as the ILECs retain 'gatekeeper' control of the carrier change process they will be able to attribute many of their errors to unaffiliated IXCs and CLECs, thereby damaging the reputations of such carriers and gaining a competitive advantage in the marketplace for themselves and their

[32] WorldCom suggests that the Commission issue a Further Notice to explore this issue. WorldCom Comments at 16.

IXC subsidiaries."[33] TRA, citing the "interminable provisioning delays" experienced by its resale carrier members who were reliant on AT&T for network facilities, claims that the past is progeny and that LECs will likewise discriminate against their rivals in PC administration.[34] LCI voices similar concerns about discrimination, as well as abuse of customer proprietary network information.

None of these parties even begins to show that a third party PC administrator is appropriate or necessary. First, Sprint's claim that ILECs will make an inordinate number of mistakes and blame those mistakes on IXCs is not only baseless and completely unsupported, but absurd on its face. For one thing, Sprint ignores that it is LECs that typically incur the wrath of customers when customers are slammed: it is LECs that customers typically contact first, and it is LECs that customers frequently blame for implementing the PC change. Moreover, these contacts consume significant resources. As Ameritech notes in its Comments, one LEC reports expending over 125,000 man-hours in 1996 handling customer slamming complaints.[35] Thus, Sprint's suggestion that LECs have incentives to botch the execution of PC changes is nothing less than fatuous, much less a credible basis for establishing a third party PC administrator.

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33 Sprint Comments at 6.

34 TRA Comments at 19-21.

35 Ameritech Comments at 5.

Similarly, TRA and LCI fail to show why existing safeguards (particularly when coupled with the additional safeguards suggested above), are not more than adequate to address any potential risk of discrimination. While TRA cites the frustration of its members in their past dealings with AT&T, AT&T was not subject to anything approaching the same regulatory framework that applies to ILECs, including, but not limited to the obligation to provide nondiscriminatory access to operations support systems (OSS) functions.[36] Its experience with AT&T thus involved altogether different circumstances.

While these parties thus offer little, if any, evidence of any need for a third party PC administrator, they completely fail to address the flip-side of the equation: the costs of reassigning PC administration to a third party. Indeed, in their zeal to take potshots at ILECs, they neglect to offer even a clue as to what they envision the role of a third party PC administrator to be. They do not indicate, for example, whether the third party administrator would simply collect PC change and PC protection requests and transmit them to LECs, which

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[36] TRA glibly dismisses the significance of OSS requirements, citing the Commission's denial of Ameritech Michigan's Section 271 application. TRA Comments at 20-21, citing Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, FCC 97-298, released August 19, 1997 (Michigan 271 Order). Of course, the fact that the Commission *denied* Ameritech Michigan's application proves just the opposite of what TRA claims: the Commission has taken what Commissioner Chong has characterized as a "hard line" on BOC provision of access to OSS functions, and it is precisely for this reason that TRA's purported concerns of discrimination are vastly overstated and, at the very least, premature. Michigan 271 Order, Separate Statement of Commissioner Rachelle B. Chong at 3. Moreover, TRA's glib critique ignores the Commission's express recognition that "Ameritech has made considerable progress toward satisfying the requirements of section 271" and its acknowledgment, in particular, of Ameritech's progress towards meeting the Commission's OSS requirements. Id. at paras. 29, 157.

would remain responsible for implementing those requests, or whether they envision a more comprehensive role -i.e., control over the entire PC change process, including LEC systems used to implement PC changes. If it is the former role they envision, they fail to explain how the establishment of a middle-man, which could significantly encumber the PC administration process, is either cost-effective or administratively desirable. If it is the latter role they envision, they do not even begin to address the myriad of technical issues and security concerns that would have to be analyzed to determine whether the proposal was even feasible, let alone the costs that would be involved in third party control over the PC administration process.[37]

In contrast, Time Warner and the Public Staff - North Carolina Public Utilities Commission appear to take a more thoughtful approach to the issue. As Time Warner notes, "[i]t simply is not economically or administratively efficient to introduce a neutral third party to administer and execute the subscriber's PC change request."[38] Likewise, various LECs note that third party administration of PC changes would be "unnecessary, impractical, too costly, and would create unnecessary duplication."[39]

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[37] To give a sense of the complexity of the PC administration processes, Ameritech attaches hereto a description of this process, which it included in a July 2, 1997, Answer to Interrogatories in a pending formal complaint proceeding.

[38] Time Warner Comments at 15. See also Public Staff- North Carolina Public Utilities Commission at 7.

[39] BellSouth Comments at 16. See also GTE Comments at 17.

These parties are correct. Proposals for a third party PC administrator are, at best, premature and, at worst, ill-conceived. The record offers absolutely no basis for further consideration of the matter at this time. In the unlikely event the Commission finds that, despite its best efforts, it is unable to police LEC discrimination, it should initiate informal industry meetings to develop the framework of a proposal which can be presented in a Further Notice of Proposed Rulemaking. For now, the issue should be tabled.

E. The Commission Should Require "Bad Actors" to Verify Inbound Sales

There is considerable division in the record as to whether carriers should be required to verify inbound sales. Some parties argue that inbound sales should be treated no differently from outbound sales. Others argue that there is no evidence that slamming is a problem on sales from inbound calls and that requiring verification of such sales would impose unnecessary costs and encumber the marketing process.

Ameritech believes that the truth lies somewhere in the middle. On the one hand, since many inbound calls are from consumers who have called for the specific purpose of ordering service, requiring verification of inbound calls often would be superfluous, causing unnecessary inconvenience to consumers and imposing unnecessary costs on carriers. On the other hand, slamming unquestionably can and does occur on inbound calls - albeit, perhaps, not with the same frequency with which it takes place on outbound calling.

After weighing the pros and cons of inbound verification, Ameritech believes that the best approach would be to require inbound verification only of carriers that appear to be engaging in excessive slamming. As discussed in its Comments, Ameritech suggests that the Commission develop a streamlined method of identifying carriers that appear to be engaging in excessive slamming and protecting consumers from those carriers. To this end, Ameritech proposed that the Commission require LECs to file quarterly reports which would reveal the percentage of PC changes submitted by each carrier that were disputed by consumers. Carriers with an excessive percentage of disputes would be subject to special safeguards. Ameritech now proposes that one of these safeguards be a requirement that the carrier verify all inbound sales. In this manner, carriers that act responsibly will not be forced to bear the increased cost associated with inbound verification, but "bad actors" will. This approach would also provide added incentives for carriers to police their marketers more effectively to ensure that their slamming levels remain under the specified threshold.

Ameritech proposes, further, that the Commission modify its verification requirements in one minor respect in order to make any inbound verification that may be required more cost-effective. Specifically, the Commission should permit carriers to transfer customers who have requested a PC change or new basic services to a voice response unit (VRU), which would prompt the caller for the information necessary to complete the verification. Current rules permit the use of VRUs, but only if: (i) operated by a third party (in which case they qualify as a third party verification); or (ii) the call to the VRU originates from the line for which the PC change or service order has been requested.[40] There is no reason for the Commission to continue these restrictions. Allowing a carrier to operate its own VRU no more compromises the verification process than does allowing carriers to rely on LOAs for verification: the only difference is that, in one case, the verification is provided in writing, in the other it is provided orally. In each case, a record can be maintained of the transaction which can be referenced in the event the customer disputes the service order. Indeed, a carrier that operated its own VRU could maintain the recording of the customer's alleged authorization long enough so that, if the customer disputed the change, the carrier could play the recording with the customer on the line. By allowing the customer to hear, first-hand, the alleged authorization, this process would enable customers to determine quickly and directly whether any one had authorized the change, and if so, whom, or whether there was some mistake or memory lapse on their own part. This would, in turn, make any LEC-submitted slamming data more accurate.

Moreover, VRUs are inherently less susceptible to abuse than are processes relying on "live" personnel. With a VRU, the message is standardized; there is no room for deviation from the script, and there is no opportunity for

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[40] Since outbound sales almost always involve the line to which the telemarketing call has been placed, this restriction does not generally prevent carriers from using voice response units for outbound sales. Inbound sales calls, on the other hand, are frequently made from lines other than those that are the object of the call. For this reason, the rule change that Ameritech seeks is relevant only to inbound sales calls (and, as noted above, calls relating to PC protection).

overzealous representatives to verify sales that were never made or to engage in other inappropriate conduct. For this reason alone, the Commission should maximize carrier options to use VRUs. The fact that the cost of a VRU-based verification is only a fraction of the cost of a verification is all the more reason to do so.

F. The Commission Should Not Inject Issues of "Intent" into its Liability Rules.

There is considerable consensus in the record that a carrier that engages in slamming should be liable to the authorized carrier for all revenues collected after the slam. Some IXCs, however, argue that this liability rule should apply only to intentional slams, which they generally define as a slam that takes place without any verification at all.[41] ACTA argues that a slammer should not be liable even when it has been "merely negligent."[42]

Ameritech opposes these limitations on the liability rules. It has been Ameritech's experience that the verification process is subject to abuse. For example, Ameritech has found that some verifiers obfuscate the distinction between interLATA and intraLATA services, or engage in other practices that, in purpose or effect, deceive and confuse customers. It has found further that verifiers sometimes attempt to verify sales that have not been made. For

41 MCI Comments at 22; TRA Comments at 13; WorldCom Comments at 15.

42 ACTA Comments at 17.

example, in instances in which customers have specifically declined an invitation to change their intraLATA service, IXC third party verifiers have attempted to verify an intraLATA sale.

So rampant were reports of these practices that Ameritech recently retained an independent consulting firm to conduct a survey of MCI's telemarketing practices. Unbeknownst to MCI, during the summer of 1997, survey callers made 100 calls to MCI to inquire about switching long distance service. These callers were specifically instructed to record accurately their conversations with MCI's representatives. These callers were further instructed to request MCI service for long distance calls only and to decline any offer to switch their local toll or intraLATA toll service.

The results of this survey are described in the Affidavit of Sara Parikh, a copy of which is attached hereto. To summarize, 79 of the 100 service orders were verified by third party verifiers. On 25 of those 79 calls, the third party verifier sought to "confirm" that the customer ordered local toll service, as well as long distance service. Indeed, in 13 cases, MCI submitted PC change orders for intraLATA toll service despite the lack of any customer authorization to do so.

This survey, as well as other evidence cited by Ameritech in its pending Formal Complaints against AT&T and MCI, demonstrate that it would be a mistake for the Commission to allow carriers to escape liability for slamming by hiding behind the verification process. That process is too easily manipulated - particularly under the existing rules which prescribe substantive content only for LOAs and not any other verification methodologies. Moreover, deliberate fraud aside, third party verifiers can be prone to mistakes, and carriers must be properly incented to police their verifiers to ensure that they are following their scripts and keeping mistakes to a minimum. Carriers will lack such incentives if the mere fact of a verification is sufficient to absolve them of carrier-to-carrier liability.[43]

G. Switchless Resellers Should Receive Their Own Carrier Identification Code

A number of commenters express deep concern over the difficulty of preventing slamming by switchless resellers which currently use the same carrier identification code (CIC) as the underlying facilities-based carrier.[44] Ameritech agrees that slamming by switchless resellers is a serious problem.

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[43] In addition, in some cases, carriers that have accidentally slammed customersdo not promptly take the necessary steps to return customers to their authorized carrier. In those instances, the carrier is as culpable as if it had engaged in intentional slamming. Ameritech recently encountered precisely this situation after MCI accidentally slammed over 7000 consumers in the Columbus, Ohio area. While these slams apparently were genuinely inadvertent - the result of an MCI systems error - MCI failed to report the situation in a timely manner and was highly unresponsive to Ameritech's efforts to develop a plan with MCI for contacting affected consumers and returning them to their preferred carrier.

[44] CICs are numeric codes that, as originally devised, enabled LECs, as providers of interexchange access services, to identify access customers in order to bill and route traffic to such customers. See Administration of the North American Numbering Plan Carrier Identificaiton Codes (CICs), CC Docket No. 92-237, FCC 97-125, Second Report and Order, released April 11, 1997 (CIC Expansion Order).

Indeed, as Ameritech noted in its Comments on MCI's PC Freeze Petition, the problem is compounded by the fact that PC protection cannot protect consumers from slamming involving switchless resellers.[45] Fortunately, however, it appears that a solution is about to become available.

On April 11, 1997, the Commission approved an industry plan to expand Feature Group D CICs from three to four digits.[46] The Commission also required that the transition to a four digit CIC be completed by January 1, 1998.[47] This expansion will make it possible, for the first time, for all switchless resellers to obtain their own CIC, and the Industry Numbering Committee (INC) already has recommended that industry guidelines be revised to so provide. INC is scheduled formally to modify the CIC assignment guidelines at its November 7, 1997, meeting.

Although Ameritech is concerned that a reseller CIC assignment requirement could cause 4 digit CICs to exhaust prematurely, Ameritech believes that the slamming problems associated with switchless reseller service are sufficiently serious that such a requirement is warranted. Ameritech

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45 Policies and Rules Pertaining to Local Exchange Carrier "Freezes" on Consumer Choices of Primary Local Exchange or Interexchange Carriers, CCB/CPD 97-19, Ameritech Comments, June 4, 1997 at 17.

46 See Administration of the North American Numbering Plan Carrier Identificaiton Codes (CICs), CC Docket No. 92-237, FCC 97-125, Second Report and Order, released April 11, 1997.

47 As the Commission recognizes, changing the number of digits in CICs requires planning by many different industries and users. For example, it requires carriers to reprogram and upgrade network switches and to educate callers with respect to the corresponding access code changes. It also requires equipment owners to reprogram and upgrade PBX switches, and manufacturers to develop and provide the necessary software and hardware. Id, n. 8.

therefore urges the Commission to follow up on INC's actions by requiring (as opposed to merely authorizing) switchless resellers to obtain their own CIC.

H. The Commission Should Clarify that the Rules Adopted Herein Do Not Apply to Wireless Services.

Three commenters - Bell Atlantic Mobile, AirTouch, and 360° Communications - ask the Commission to clarify that the anti-slamming proposals in the Notice do not apply to Commercial Mobile Radio Service (CMRS) providers. They note that slamming has never been a problem in the CMRS industry, in part, because CMRS providers operate in a completely different business and regulatory environment than do landline carriers. They note, for example, that customers wishing to change CMRS providers do so, not by submitting a PC change order, but by contracting directly with their new CMRS provider and terminating service with the old provider. They note, further, that some customers must purchase new handsets to change carriers, and that because of the unique fraud concerns associated with wireless service, CMRS providers typically require extensive credit checks, as well as a customer signature before providing service. Finally, they note that CMRS providers are not subject to equal access requirements with respect to interexchange services.[48]

As these commenters note, taken literally, the Commission's proposed anti-slamming rules would apply to CMRS providers, as well as landline carriers

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48 See, e.g., Bell Atlantic Mobile Comments at 1-7.

- since by their terms, they would provide to all telecommunications carriers. There is no reason to impose verification and other slamming-related requirements on an industry in which slamming is not an actual or even potential problem. Therefore, Ameritech joins these other commenters in asking the Commission to make clear that the rules enacted in this proceeding do not apply to CMRS providers.

I. The Commission Must Address in More Detail Billing Issues Raised by its Proposed Liability Rules

Sprint's Comments note the difficulties involved in adopting LEC billing systems to accommodate the liability rules proposed by the Commission.[49] Although Sprint approached the issue from the standpoint of the IXC, the issues it raises are equally problematic for the billing LEC. In those instances in which LECs provide billing for an IXC, consumers pay a single amount for their local and long distance usage. If the consumer provides a partial payment, that payment is allocated among the various services for which the consumer has been billed in accordance with regulatorily mandated formulas. Thus LECs face substantial difficulty in establishing a precise amount that a consumer has actually paid for usage billed by a particular carrier. LECs ultimately recourse to the carriers for whom they bill amounts that are not collected, but this procedure takes several months.

[49] Sprint Comments at note 25.

Ameritech proposes to deal with these billing issues in the following fashion. If a consumer who contacts the LEC to report a slam has not yet paid the slamming carrier's bill, the LEC should be permitted to adjust the entire amount billed by the slamming carrier off the consumer's bill, thereby eliminating the amount from the consumer's balance due. If the LEC has already acquired the receivable for this usage from the slamming carrier, the LEC would recourse this amount back to the carrier n accordance with agreed-upon procedures.

If the consumer already has paid some or all of the amount billed by the slamming carrier, the LEC should be permitted to adjust the entire amount billed off the consumer's bill, providing a credit in the amount paid, which can be applied to the unpaid balance or to future billings, and eliminating the remainder from the consumer's balance. If the consumer has paid only a portion of his or her total bill, the LEC would determine the amount to be credited to the consumer based on its allocation of the amounts that have been paid among the carriers and services on the bill. The LEC would then recourse the entire amount billed by the slamming carrier back to that carrier.

A more difficult - though perhaps relatively unlikely - situation would arise if the slamming carrier has legitimate charges on the consumer's bill - for example, if the consumer made dial-around calls on the slamming carrier's network even though he/she did not wish to be presubscribed to the carrier. In such instances, Ameritech - and presumably other LECs - would be unable to segregate the authorized from the unauthorized charges owed to the carrier. Ameritech proposes that LEC be permitted to treat such situations as if the entire amount billed by the slamming carrier were unauthorized, to be handled in accordance with the procedures set forth in the preceding paragraphs.[50]

Respectfully Submitted,

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September 29, 1997

[50] This proposal is not intended to affect the manner in which the authorized carrier deals with the slamming carrier or bills the consumer. Rather, it is intended to address the responsibilities of the LEC and slamming carrier as the LEC endeavors to accommodate the slammed consumer.

EXHIBIT A

AMERITECH'S PC
ADMINISTRATION PROCESS

PIC-change orders sent by tape are received at a tape center, where the tapes are manually logged and loaded into Ameritech's CARE system. Electronic orders are sent via Connect:Direct to a control center. At the control center, employees monitor the files containing the PIC change requests to ensure they are complete. The files are then input into the CARE system, which date and time stamps them.

Once an order is entered into the CARE system, CARE performs a number of validation functions. For example, it verifies that the file contains as many records as indicated. It also verifies that each telephone number for which a PIC change is requested is a valid number; whether the lines are subscribable; and whether they are restricted (i.e., contain "PIC freezes"). After these and other verification functions are complete, and assuming that the order can go forward, CARE forwards the file to ACIS , which further edits the file by providing information needed to process multi-line accounts. ACIS then sends the file to NetExpert, which verifies that the file is readable and in the correct format and creates a log of the file, including a date and time stamp. NetExpert then sends the file to MAGI, which, by interfacing with the switch (as opposed to records contained in a database), further verifies the telephone lines covered by the order and formats the record so that it can be processed by Ameritech switches. MAGI also communicates with two databases: Informix, which creates a log of the request, and the Custom database, which manages the flow of orders sent to switches. MAGI then sends the record to the appropriate MARCH system, which sends the record to the appropriate switch. If the order is rejected (for example, if the customer chose a carrier that hasn't purchased Feature Group-D service for the switch in question or for other reasons), personnel monitoring

MARCH will manually intervene. If the order is not rejected, it is transmitted to the switch, which changes the PIC and sends a confirmation to MARCH, which forwards it to MAGI. MAGI then matches the orders returned with the orders sent out (in Informix). Confirmations are then forwarded by MAGI to NetExpert, which logs them in and sends them on to CARE. Employees working with MAGI, CARE, ACIS, NetExpert, and MARCH investigate any discrepancies between orders transmitted and orders received and make sure that all problems are addressed. Once received by CARE, CARE creates records to be sent to each carrier of all confirmations and rejects, transmitting such information in the same format (electronically or by tape) in which the information was received from the carrier. It also determines whether the customer or the carrier is to be billed for the change and creates a billing record.

Throughout this process, Ameritech employees monitor the various systems involved, including the hand-offs that must occur among these systems. Manual intervention is required whenever there is a system or transmission failure.

In July 1996, Ameritech made available to interexchange carriers a Graphical User Interface (GUI) for submitting PIC change orders. Carriers that use GUI dial into an Ameritech modem pool and GUI server, which allows them to pass their PIC change requests directly into NetExpert. Once NetExpert records a record of the request, it transmits the information to CARE for validation and the processes that follow.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ILLINOIS BELL TELEPHONE COMPANY d/b/a AMERITECH ILLINOIS, INDIANA BELL TELEPHONE COMPANY d/b/a AMERITECH INDIANA, MICHIGAN BELL TELEPHONE COMPANY d/b/a AMERITECH MICHIGAN, THE OHIO BELL TELEPHONE COMPANY d/b/a AMERITECH OHIO, and WISCONSIN BELL, INC. d/b/a AMERITECH WISCONSIN,	)	**File No. E-97-42**
Complainants,	)	
v.	)	
MCI TELECOMMUNICATIONS CORPORATION,	)	
Defendant.	)	

AFFIDAVIT OF SARA PARIKH

Having been first duly sworn, affiant testifies as follows:

1. My name is Sara Parikh. I am over the age of 21 and have first-hand, personal knowledge of and could competently testify to the matters set forth in this affidavit.

2. I am a Senior Researcher and have been employed by Leo J. Shapiro & Associates, Inc. since 1985. I directly supervise persons who conduct telephone marketing surveys and related activities. My employer is not affiliated in any way with Ameritech Corporation or any of its related companies, affiliates, or subsidiaries.

3. At the request of counsel for Ameritech Corporation, I developed and supervised a telephone survey of the type customarily referred to as "mystery shopping." In

particular, callers working under my supervision made telephone calls to MCI Communications Corporation ("MCI") for a specific purpose and pursuant to specified instructions as follows:

a. My survey callers were instructed, in writing and orally, as follows:

i. "Your Objective is to switch to MCI's long distance service and to write down as completely as possible the conversation that transpires between you and MCI in the process of signing up."

ii. "If the representative refers to any other type of service (e.g. local toll calls, intraLATA, in-state, or short long distance), probe/clarify term: What do you mean by that? What is . . . (local toll calls, intraLATA, etc.)"

iii. "If the representative asks you if you want to sign up for anything other than long distance, say: No, I just want to sign up for MCI's long-distance service."

b. The results of the survey were:

i. Third-party verifiers came on the line for 79 of the 100 calls. In 25 of those calls -- or approximately one-third of the times that a third-party verifier came on the line -- the third-party verifier attempted to "confirm" that local calls had been switched, even though the caller had made no such request and had no such desire;

ii. In 21 of the 100 calls, no third-party verifier came on the line.

c. Afterwards, Ameritech ran checks at my request to determine MCI-requested service change orders that resulted in the telephone numbers that the survey callers had provided to MCI. In 13 of the 100 calls, MCI requested local toll call service switches from Ameritech to MCI, despite the stated desires of the survey caller and/or the information obtained by the third-party verifier.

Further Affiant sayeth not.

Sara Parikh

SARA PARIKH

SUBSCRIBED and SWORN
to before me this 23 day
of September 1997.

"OFFICIAL SEAL"
GERALD KOHN
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 2/22/99

Gerald Kohn

Notary Public

CERTIFICATE OF SERVICE

I, Toni R. Acton, do hereby certify that a copy of the foregoing Ameritech Reply has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 29th day of September 1997.

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Toni R. Acton

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